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August 21, 2023

Via ECF

Judge Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: *Grande v. 48 Rockefeller Corp. et al.*
Case No.: 1:21-cv-01593

Dear Judge Gardephe:

We are counsel to Plaintiff in the above-referenced matter and write jointly with counsel for Defendants to respectfully request that the Court stay all dates and deadlines in the above referenced case, including the deadline to file objections to the Report and Recommendation entered with respect to Plaintiff's motions for Partial Summary Judgment and for Class Certification. The deadline to object to the Report and Recommendation is currently August 25, 2023, per the Court's entry, dated August 11, 2023 [Dkt. No. 78].

The reason for this request is because the parties have agreed to attend private class-wide mediation with Raymond Nardo, esq. The mediation is scheduled for September 15, 2023 and will be virtual.

There have been no previous requests for a stay in this matter, and the request is consented to by all parties. We thank the Court in advance for its consideration of our inquiry.

Respectfully submitted,

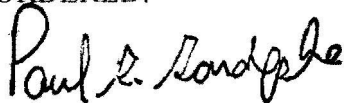
/s/ C.K. Lee

cc: all parties via ECF

MEMO ENDORSED:

The case is stayed pending the outcome of the scheduled mediation. By **September 20, 2023**, the parties will file a joint letter informing the Court whether the mediation was successful.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: August 22, 2023